

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Damon Grant	)	
	)	
	)	Case No. <u>14-30344-KLP</u>
	)	
	)	
Debtor(s)	)	Chapter <u>13</u>
	)	
Address <u>7094 Marie Lane</u>	)	
<u>Mechanicsville, VA 23111</u>	)	
	)	
Last four digits of Social Security No(s): <u>5083 &amp; 9163</u>	)	
	)	
	)	

**Amended NOTICE OF MOTION**

Damon Grant has filed papers with the court to Substitute Counsel.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before December 17, 2014, you or your attorney must:

X File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.  
8501 Mayland Dr., Ste 106  
Henrico, VA 23294

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☐ Attend the hearing on the motion (or objection) scheduled to be held on \_\_\_\_\_ at \_\_\_\_\_ . m. at United States Bankruptcy Court, 701 East Broad Street, Ctrm 5100 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 12/10/2014

Signature, name, address, and telephone number of person giving notice:

/s/ Richard J. Oulton

Richard J. Oulton, Esq.

America Law Group, Inc.

8501 Mayland Dr., Ste 106

Henrico, VA 23294

VSb No. 23294

Counsel for Damon Grant

#### Certificate of Service

I hereby certify that I have this 10<sup>th</sup> day of December, 2014 mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Richard James Oulton

Richard James Oulton, Esq.

## Creditors

**ALTAIR OH XIII, LLC**  
C O WEINSTEIN, PINSON, AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121

**America Law Group, Inc.**  
t/a Debt Law Group  
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Malvern PA 19355-0701

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PO Box 788  
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**United States Attorney**

Main Street Centre 18th Flr.  
600 East Main Street  
Richmond, VA 23219

**Victoria's Secret**

Attention: Bankruptcy  
P.O. Box 182125  
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**Virginia Department of Taxation**

PO Box 2156  
Richmond, VA 23218

**Webbank/Fingerhut**

6250 Ridgewood Road  
Saint Cloud, MN 56303-0000

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
Damon Grant	)	Case No.: 14-30344-KLP
	)	Chapter 13
Debtor	)	

**Amended MOTION FOR SUBSTITUTION OF COUNSEL**

COMES NOW Damon Grant the Debtor herein and moves the Court to allow the substitution of Richard James Oulton, Esquire and in support thereof states as follows:

1. Damon & Cynthia Grant filed a joint petition for relief under Chapter 13 of the Bankruptcy Codes on 1/24/2014 and were assigned case number 14-30344.
2. The current bankruptcy case was filed with Roger C. Hurwitz of Woehrlé Franklin Dahlberg Jones PLLC.
3. Cynthia Grant has filed on November 26, 2014 a separate motion to the Court to allow a substitution of counsel so that Jacqueline W. Sharman, Esquire will represent her for the remainder of the case.
4. Debtor has signed consent authorizing Richard James Oulton to substitute as attorney.

WHEREFORE, the Debtor moves the Court to allow the substitution of Richard J. Oulton, Esquire, as counsel for the Debtor in place of Roger C. Hurwitz, as per the request of the Debtor.

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1,  
UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING  
MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON  
THE MOVING PARTY WITHIN TEN (10) DAYS OF THE SERVICE OF THIS  
MOTION TO SUBSTITUTE COUNSEL, THE COURT MAY DEEM ANY  
OPPOSITION WAIVED AND ISSUE AN ORDER SUSTAINING THE MOTION  
WITHOUT FURTHER NOTICE OR HEARING.

Respectfully submitted,  
Damon Grant

By: /s/ Richard James Oulton, Esquire  
Richard James Oulton, Counsel

I ask for this:

/s/ Damon Grant

Damon Grant

Richard James Oulton, Esquire  
VSB # 29640  
America Law Group, Inc.  
8501 Mayland Dr. Ste 106  
Henrico, VA 23294  
Ph: 804-308-0051

## CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing Motion was mailed by electronic means or by first class USPS mail, postage prepaid to Robert Hyman, Chapter 13 Trustee, Roger C. Hurwitz of Woehrle Franklin Dahlberg Jones PLLC, and all necessary parties, listed below, on Dec. 10, 2014.

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In Re:	)	
Damon Grant	)	Case No.: 14-30344-KLP
	)	
Debtor	)	Chapter 13
	)	

**PROPOSED ORDER AUTHORIZING  
SUBSTITUTION OF COUNSEL**

Came this day the debtor, by counsel, and upon Debtor's Motion to Substitute Counsel, and the Court having considered the motion I detail, and finding it in order and proper to approve the same, it is hereby

ORDERED that ATTORNEY be allowed and is hereby granted relief to withdraw and is withdrawn as counsel for the debtor and that Richard James Oulton is hereby substituted as counsel for Debtor in this action.

Entered \_\_\_\_\_.

\_\_\_\_\_  
United States Bankruptcy Judge

We ask for this:

Entered on docket: \_\_\_\_\_.

/s/ Richard James Oulton  
Richard James Oulton, VSB 29640  
America Law Group, Inc.  
Debt Law Group  
8501 Mayland Dr., Ste 106  
Henrico, VA 23294  
Ph: 804-308-0051  
Proposed Counsel for Debtor

Seen and agreed:

\_\_\_\_\_  
Roger C. Hurwitz  
Woehrle Franklin Dahlberg Jones PLLC

## CERTIFICATE OF SERVICE

Pursuant to Local Rules of this Court, I hereby certify that this proposed Order was either endorsed by or a true copy was served on all necessary parties via first-class mail, postage prepaid on this the 10<sup>th</sup> day of December, 2014, including those parties listed on the attached Service List.

/s/ Richard J. Oulton  
Richard J. Oulton

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